

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Complaint on Sunday
and Holiday Collections

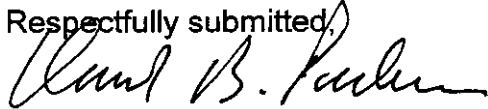
Docket No. C2001-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSES TO INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE [DBP/USPS-13g, 14, and 16] AND
POTENTIAL MOTION FOR LATE ACCEPTANCE

July 6, 2001

I move to compel responses to interrogatories submitted to the United States Postal Service that were objected to by them on June 28, 2001. This motion is being mailed on July 6, 2001, and should arrive at the Commission on July 9, 2001, under current USPS standards. In the event that they do not arrive by the deadline, I move for late acceptance.

Respectfully submitted,



July 6, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

1. DBP/USPS-13g Interrogatory DBP/USPS-13[g] filed on June 21, 2001 requests:

574 Please provide a revised library reference USPS-LR-2/C2001-1 that utilizes a code, such as "FWD", to indicate those instances where the mail was forwarded to another facility to process.

This library reference provides a ten-year listing of all of the processing plants in the country and shows the percentage of mail that each of the plants processed on each of the holidays throughout the year.

2. In this proceeding, the Commission is exploring the adequacy of the Postal Service's level of service on holidays. There are at least two important components of the level of service. One is the amount of mail that is being processed on a given holiday while the other is the percentage of facilities that process mail on a given

holiday. Library reference 2 only shows a measure of the volume of mail that is being processed. It does not show the areas of the country that received mail processing on a given holiday. As indicated in the Postal Service's Objection at 1 and in their responses to Interrogatories DBP/USPS-13 subparts c to f, plants will consolidate their mail for a given holiday.

3. For example, on most Saturdays throughout the year, the Hackensack NJ 076 plant will send all of the mail arriving from the 076 ZIP Code area to the Paterson NJ 074/075 plant for processing. I still have my mail processed on Saturday except instead of being postmarked with a Hackensack postmark and being processed in that building, it will have a Paterson postmark and be processed in that building. In this scenario, the library reference would show a higher value for Paterson and a 0.000 for Hackensack. The problem in evaluating the library reference is that I have no way of knowing which plants are nearby to the 0.000 plant and I have no way knowing that the plant that processes the mail has received the mail. This consolidation could have been in effect for the entire ten years or the change in volume could be as a result of a more extensive collection policy.

4. It is critical to be able to evaluate the percentage of plants that process mail on a given holiday and the trend over the ten-year period. This is very material to exploring the adequacy of service. The percentage of plants that process mail on a given holiday is the best proxy as to the percentage of the country's population that have mail service available to them. As far as the burden of providing the data goes, the burden is broken up into two parts. The first is asking each of the plants the extent, if any, to which they have sent their mail to another plant for processing on a given holiday. This should be an easy question to answer since it should fall into one of several categories, "we never sent the mail to another plant", or "we always send the mail to [neighboring plant] on holidays A, B, and C" or "starting in 1997 we sent the mail", etc.

5. The second part of the burden is for tabulation of the data. The Postal Service overlooks the very important consideration in this tabulation. The more data that they

would have to tabulate, the more significant this consolidation is and therefore the more need in expending the effort to obtain a more reliable library reference.

6. To the extent the Mr. Carlson files a Motion to Compel a response to the similar DFC/USPS-50, his motion is incorporated herein as it relates to DBP/USPS-13g.

7. DBP/USPS-14 While the Commission has stated that they will not focus on the requirements contained in the Postal Operations Manual, this only indicates a focus and not a complete elimination of the unfocused area. This interrogatory asks two very simple, and apparently very obvious, questions.

8. DBP/USPS-16 This interrogatory asks for an updating and reconfirmation of the response made to R2000-1 Interrogatory DBP/USPS-67c relating to the POM requirement for exceptions to the level of service provided. While the Commission has stated that they will not focus on the requirements contained in the Postal Operations Manual, this only indicates a focus and not a complete elimination of the unfocused area.

9. For the reasons stated, I move to compel responses to the referenced interrogatories.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

July 6, 2001


David B. Popkin